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Newark / Philadelphia

July 22, 2024

VIA ECF

Hon. Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Grushack v. New Jersey Department of Corrections, et al.*
Docket No.: 2:21-cv-623

Dear Judge Hammer:

This office was recently retained by the New Jersey Office of the Attorney General (“AG”) to represent Defendants New Jersey Department of Corrections (“DOC”) and Marcus O. Hicks (“Hicks”) (collectively “Defendants”) in the above referenced matter.

The undersigned filed a notice of appearance in this matter on July 22, 2024. Upon entering this case, our office learned of Your Honor’s May 17, 2024 order scheduling motions for summary judgment to be served on or before Friday, July 26, 2024.

Due to our recent entry into this matter and the need to gather all the discovery and documentation, we respectfully request an adjournment of those deadlines and welcome a conversation with the Court and all counsel of record to discuss the schedule. Additionally, in an effort to keep the Court apprised of our status in this matter, we wish to inform Your Honor that we are currently working alongside the AG’s office to ensure there is a full transfer of all case files to our office.

We look forward to discussing this scenario with Your Honor if you care to hold a telephone conference to discuss same.

Respectfully,

/s/ Victor A. Afanador

Victor A. Afanador, Esq.

VAA:cd
cc: All counsel of record (via ECF)